

1 Michael R. Lazerwitz (PRO HAC VICE)
2 Jeremy J. Calsyn (Bar No. 205062)
3 Lee F. Berger (Bar No. 222756)
4 CLEARY GOTTLIEB STEEN & HAMILTON LLP
5 One Liberty Plaza
6 New York, NY 10006
7 (212) 225-2000 (Phone)
8 (212) 225-3999 (Facsimile)
9 *mlazerwitz@cgsh.com*

10 *Attorneys for Defendants*
11 LG DISPLAY AMERICA, INC.
12 AND LG DISPLAY CO., LTD

13 [additional parties and counsel listed in signature block]

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **(SAN FRANCISCO DIVISION)**

17 IN RE TFT-LCD (FLAT PANEL)
18 ANTITRUST LITIGATION

19 **Master File No. 3:07-md-1827 SI, MQ**

20 **MDL No. 1827**

21 **No. C 10-5458 SI**

22 **STIPULATION AND [PROPOSED]
23 ORDER REGARDING DATE FOR
DEFENDANTS' ANSWER TO SB
LIQUIDATION TRUST'S FIRST
AMENDED COMPLAINT**

24 This Document Relates to:
25 Case No.: 10-cv-5458 SI

26 SB LIQUIDATION TRUST,
27 Plaintiff,

28 vs.

29 AU Optronics Corporation, et
al.,

30 Defendants

31 WHEREAS plaintiff Syntax-Brillian Liquidation Trust, filed a First Amended
32 Complaint in the above-captioned case against Defendants AU Optronics Corporation, AU
33 Optronics Corporation America, Inc., Chi Mei Corporation, Chi Mei Optoelectronics USA,
34 Inc., CMO Japan Co., Ltd., Nexgen Mediatech, Inc., Nexgen Mediatech USA, Inc.,
35 Chunghwa Picture Tubes Ltd., Tatung Company of America, Inc., Epson Imaging Devices

1 Corporation, Epson Electronics America, Inc., HannStar Display Corporation, LG Display
2 Co. Ltd., LG Display America, Inc., Samsung Electronics Co., Ltd., Samsung
3 Semiconductor, Inc., Samsung Electronics America, Inc., Sharp Corporation, Sharp
4 Electronics Corporation, Toshiba Corporation, Toshiba America Electronic Components,
5 Inc., Toshiba America Information Systems, Inc., Toshiba Mobile Display Co., Ltd., Hitachi
6 Displays, Ltd., Hitachi Electronic Devices (USA), Inc., and Hitachi, Ltd. (“Stipulating
7 Defendants”), on June 21, 2011;

8 WHEREAS the Court denied the Stipulating Defendants’ motion to dismiss the First
9 Amended Complaint on September 19, 2011;

10 WHEREAS the Stipulating Defendants’ deadline to respond to the First Amended
11 Complaint currently is October 3, 2011;

12 WHEREAS extending the Stipulating Defendants’ time to respond to the First
13 Amended Complaint will not alter the date of any other event or deadline already fixed by
14 the Court;

15 THEREFORE, SB Liquidation Trust and the Stipulating Defendants hereby agree:

16 1. The Stipulating Defendants’ deadline to answer to the First Amended
17 Complaint shall be October 25, 2011.

18
19 DATED: September 26, 2011

20 By: /s/ Michael R. Lazerwitz
21 Michael R. Lazerwitz (PRO HAC VICE)
22 Jeremy J. Calsyn (Bar No. 205062)
23 Lee F. Berger (Bar No. 222756)
24 CLEARY GOTTLIEB STEEN & HAMILTON
25 LLP
26 One Liberty Plaza
27 New York, NY 10006
28 (212) 225-2000 (Phone)
(212) 225-3999 (Facsimile)
mlazerwitz@cgs.com

Attorneys for Defendants LG Display Co., Ltd.
and LG Display America, Inc.

1 By: /s/ Christopher A. Nedeau

2 Christopher A. Nedeau
3 Carl L. Blumenstein
4 Allison Dibley
5 NOSSAMAN LLP
6 50 California Street, 34th Floor
7 San Francisco, CA 94111
8 (415) 398-3600 (Phone)
9 (415) 398-2438 (Facsimile)
10 cnedreau@nossaman.com

11 *Attorneys for Defendants AU Optronics
12 Corporation and AU Optronics
13 Corporation America*

14 By: /s/ Christopher B. Hockett

15 Christopher B. Hockett (Bar No. 121539)
16 Neal A. Potischman (Bar No. 254862)
17 Sandra West (Bar No. 250389)
18 Samantha H. Knox (Bar No. 254427)
19 Micah G. Block (Bar No. 270712)
20 DAVIS POLK & WARDWELL LLP
21 1600 El Camino Real
22 Menlo Park, California 94025
23 (650) 752-2000 (Phone)
24 (650) 752-2111 (Facsimile)
25 chris.hockett@davispolk.com
26 neal.potischman@davispolk.com
27 sandra.west@davispolk.com
28 samantha.knox@davispolk.com
1 micah.block@davispolk.com

2 Jonathan D. Martin (pro hac vice)
3 Bradley R. Hansen (pro hac vice)
4 450 Lexington Avenue
5 New York, New York 10017
6 (212) 450-3000 (Phone)
7 (212) 701-5800 (Facsimile)
8 jonathan.martin@davispolk.com
9 bradley.hansen@davispolk.com

10 *Attorneys for Defendants Chi Mei
11 Corporation, Chimei Innolux Corporation
12 (f/k/a Chi Mei Optoelectronics Corp.), Chi
13 Mei Optoelectronics USA, Inc., Nexgen
14 Mediatech, Inc., Nexgen Mediatech USA,
15 Inc., and CMO Japan Co., Ltd*

1 By: /s/ Derek F. Foran
2 Melvin R. Goldman (Bar No. 34097)
3 Stephen P. Freccero (Bar. No 131093)
4 Derek F. Foran (Bar No. 224569)
5 MORRISON & FOERSTER LLP
6 425 Market Street
7 San Francisco, CA 94105-2482
8 (415) 268-7000 (Phone)
9 (415) 268-7522 (Facsimile)
10 *sfreccero@mofo.com*

11 *Attorneys for Defendants Epson Imaging*
12 *Devices Corporation and Epson*
13 *Electronics America, Inc.*

14 By: /s/ Ramona M. Emerson
15 Hugh F. Bangasser (*pro hac vice*)
16 Ramona M. Emerson (*pro hac vice*)
17 K&L GATES LLP
18 925 Fourth Avenue, Suite 2900
19 Seattle, WA 98004-1158
20 (206) 623-7580 (Phone)
21 (206) 623-7022 (Facsimile)
22 *Ramona.Emerson@klgates.com*

23 Jeffrey L. Bornstein (Bar No. 99358)
24 K&L GATES LLP
25 Four Embarcadero Center, Suite 1200
26 San Francisco, CA 94111
27 (415) 249-1059 (Phone)
28 (415) 882-8220 (Facsimile)

18 *Counsel for Defendant HannStar Display*
19 *Corporation*

20 By: /s/ Kent M. Roger
21 Kent M. Roger (Bar No. 95987)
22 Jennifer L. Calvert (Bar No. 258018)
23 MORGAN LEWIS & BOCKIUS LLP
24 One Market, Spear Street Tower
25 San Francisco, CA 94105-1126
26 (415) 442-1000 (Phone)
27 (415) 442-1001 (Facsimile)
28 *kroger@morganlewis.com*

26 *Attorneys for Defendants Hitachi, Ltd.,*
27 *Hitachi Displays, Ltd. and Hitachi*
28 *Electronic Devices (USA), Inc.*

1 By: /s/ Robert Wick

2 Robert Wick (*pro hac vice*)
3 Neil Roman (*pro hac vice*)
4 Derek Ludwin (*pro hac vice*)
5 COVINGTON & BURLING LLP
6 1201 Pennsylvania Ave., NW
7 Washington, DC 20004
8 (202) 662-6000 (Phone)
9 (202) 662-6291 (Facsimile)
10 *rwick@cov.com*

11 *Attorneys for Defendants Samsung*
12 *Electronics Co., Ltd., Samsung*
13 *Semiconductor, Inc. and Samsung*
14 *Electronics America, Inc.*

15 By: /s/ John M. Grenfell

16 John M. Grenfell (Bar No. 88500)
17 Jacob R. Sorensen (Bar No. 209134)
18 Fusae Nara (*pro hac vice*)
19 Andrew D. Lanphere (Bar No. 191479)
20 PILLSBURY WINTHROP SHAW
21 PITTMAN LLP
22 50 Fremont Street
23 San Francisco, CA 94105
24 (415) 983-1000 (Phone)
25 (415) 983-1200 (Facsimile)
26 *john.grenfell@pillsburylaw.com*

27 *Attorneys for Defendants Sharp*
28 *Corporation and Sharp Electronics Corp.*

18 By: /s/ Rachel. S. Brass

19 Joel S. Sanders (Bar No. 107234)
20 Rachel S. Brass (Bar No. 219301)
21 Rebecca Justice Lazarus (Bar No. 227330)
22 GIBSON, DUNN & CRUTCHER LLP
23 555 Mission Street, Suite 3000
24 San Francisco, CA 94105
25 (415) 393-8200 (Phone)
26 (415) 393-8306 (Facsimile)
27 *rbrass@gibsondunn.com*

28 *Counsel for Defendants Chunghwa Picture*
29 *Tubes, Ltd. and Tatung Company of*
30 *America*

1 By: /s/ John H. Chung
2 John H. Chung (*pro hac vice*)
3 WHITE & CASE LLP
4 1155 Avenue of the Americas
5 New York, NY 10036-2787
6 (212) 819-8200 (Phone)
7 (212) 354-8113 (Facsimile)
8 *jchung@whitecase.com*

9
10 Christopher M. Curran (*pro hac vice*)
11 Kristen J. McAhren (*pro hac vice*)
12 WHITE & CASE LLP
13 701 Thirteenth Street, NW
14 Washington, DC 20005-3807
15 (202) 626-3600 (Phone)
16 (202) 639-9355 (Facsimile)
17 *ccurran@whitecase.com*
18 *kmcahren@whitecase.com*

19
20 *Attorneys for Defendants Toshiba*
21 *Corporation, Toshiba Mobile Display Co.,*
22 *Ltd., Toshiba America Electronic*
23 *Components, Inc. and Toshiba America*
24 *Information Systems, Inc.*

25
26 By: /s/ Steve G. Sklaver
27 Marc M. Seltzer (Bar No. 54534)
28 Steve G. Sklaver (Bar No. 237612)
1 Ryan C. Kirckpatrick (Bar No. 243824)
2 SUSMAN GODFREY LLP
3 1901 Avenue of the Stars, Suite 950
4 Los Angeles, California 90067-6029
5 Telephone: (310) 789-3100
6 Facsimile: (310) 789-3150
7 *mseltzer@susmangodfrey.com*
8 *Ssklaver@susmangodfrey.com*
9 *rkirkpatrick@susmangodfrey.com*

10
11 *Attorneys for Plaintiff SB Liquidation Trust*

12
13 **Attestation:** The filer of this document attests that concurrence in the filing of this
14 document has been obtained from each of the other signatories.

15
16 By: /s/ Michael R. Lazerwitz
17 Michael R. Lazerwitz

[PROPOSED] ORDER

Under the parties' stipulation set forth above, IT IS SO ORDERED.

Dated: 9/27 , 2011

By:

Hon. Susan Illston
United States District Judge